



WASHINGTON FARM BUREAU

P.O. Box 2009, Olympia, WA 98507

January 24, 2005

Endangered Species Program
Washington Department of Agriculture
P.O. Box 42589
Olympia, WA 98504-2589

RE: Comments on the Washington State Endangered Species Protection Plan for Pesticide Use

Dear Endangered Species Program Staff:

On behalf of the more than 35,000 Washington Farm Bureau member families, we thank you for the opportunity to comment on the Washington State Endangered Species Protection Plan for Pesticide Use.

We commend the Department for considering the needs of agriculture, especially as related to the use of plant protection products. We are very aware of the challenges to the continued availability of pesticides, and we encourage the Department to be actively engaged in ensuring that such production tools remain available.

The plan is divided into three phases (page 7): exchanging data with the EPA; exchanging data with NOAA Fisheries; and developing county bulletins as supplemental pesticide labeling instructions are all interesting and potentially valuable actions. It must be clearly understood, however, that the state's role is and must be limited to informing the process and strengthening the position of farmers and the continued availability of plant protection products. At page 3, the Plan indicates that it will "contribute to the protection of" listed species. The state is not responsible for implementing the federal Endangered Species Act. This is the role of federal agencies. **We recommend clearly stating this position in a prominent location in the document.**

We support the efforts to assist federal agencies by providing them additional data related to actual pesticide product use. However, a critical issue left unaddressed by the Plan is how individual farm use information will remain anonymous. Providing information in the aggregate is perfectly acceptable and valuable. However, under no circumstances should data collected on farm data tied to a specific grower ever be made public information. As long

as anonymity is preserved, we can support collection and dissemination as needed of such information.

In conclusion, we applaud the Department for taking a proactive approach in these matters. With adjustments made to ensure privacy for pesticide users and to ensure that the state does not obligate itself to implementing the Endangered Species Act in lieu of federal agencies retaining this role, we are supportive of the efforts outlined in the Plan.

Sincerely,

John Stuhlmiller
Assistant Director of Government Relations
Washington Farm Bureau